

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

AMY CHAN, STEVEN WADE, and
SHUNFENG CHENG,
INDIVIDUALLY AND ON BEHALF
OF ALL OTHERS SIMILARLY
SITUATED,

Plaintiffs,

v.

NEW ORIENTAL EDUCATION &
TECHNOLOGY GROUP INC., and
CHENGGANG ZHOU,

Defendants.

No.: 2:16-cv-09279-KSH-CLW

CLASS ACTION

MOTION DATE: July 6, 2020

**NOTICE OF LEAD PLAINTIFFS' UNOPPOSED MOTION FOR
PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT**

PLEASE TAKE NOTICE that, on July 6, 2020, Lead Plaintiffs Amy Chan, Steven Wade, Shunfeng Cheng and Elburn Irish ("Plaintiffs") will move this Court, before the Honorable Katherine S. Hayden, United States District Judge, Martin Luther King Building & U.S. Courthouse, 50 Walnut Street, Newark, NJ 07101, or by telephonic or video conference, for an Order: (a) preliminarily approving the Settlement; (b) preliminarily approving the proposed settlement class ("Settlement Class"); (c) approving the form, manner, and content of the notice of the settlement to the Settlement Class; (d) preliminarily approving the

plan to allocate the settlement proceeds (“Plan of Allocation”); and (e) setting relevant dates for disseminating notice, for Settlement Class Members to file claims, opt out of, or object to the Settlement, and to set a date for a hearing on final approval of the Settlement.

Defendants do not oppose this motion.

Dated: June 3, 2020

Respectfully submitted,

THE ROSEN LAW FIRM, P.A.

By: /s/Laurence M. Rosen

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Co-Lead Counsel to Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on this 3rd day of June 2020, a true and correct copy of the foregoing document was served by CM/ECF to the parties registered to the Court's CM/ECF system.

/s/ Laurence M. Rosen